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U.S. BANK NATIONAL ASSOCIATION,
SUCCESSOR IN INTEREST TO BANK OF
AMERICA, NATIONAL ASSOCIATION,
SUCCESSOR BY MERGER TO
LASSALLE BANK NATIONAL
ASSOCIATION AS TRUSTEE FOR
GSAMP TRUST 2007-NC1 MORTGAGE
PASS-THROUGH CERTIFICATES,
SERIES 2007-NC1

Plaintiff,

vs.

FIDELITY NATIONAL TITLE GROUP,
INC., et al.,

Defendants.

Case No.: 2:21-cv-00537-JCM-BNW

**STIPULATION AND PROPOSED
ORDER EXTENDING DEFENDANT
CHICAGO TITLE INSURANCE
COMPANY'S TIME TO RESPOND
TO RENEWED MOTION FOR
REMAND [ECF No. 22]**

(First Request)



1 Defendant Chicago Title Insurance Company (“Chicago Title”) and Plaintiff U.S. Bank
 2 N.A. (“U.S. Bank”) (collectively, the “Parties”), by and through their counsel of record, hereby
 3 stipulate and agree as follows:

- 4 1. On April 1, 2021, U.S. Bank filed its Complaint in the Eighth Judicial District Court,
 5 Case No. A-21-832212-C [ECF No. 1-1];
- 6 2. On April 2, 2021, Chicago Title filed a Petition for Removal to this Court [ECF No.
 7 1];
- 8 3. On May 3, 2021, U.S. Bank filed a Motion for Remand [ECF No. 6] and Motion for
 9 Costs and Fees [ECF No. 7];
- 10 4. On June 9, 2021, the Court entered an order, pursuant to the Parties’ stipulation,
 11 staying the case pending resolution of *Wells Fargo Bank, N.A. v. Fidelity National*
 12 *Title Ins. Co.* Ninth Cir. Case No. 19-17332 (the “*Wells Fargo II Appeal*”). Upon
 13 entry of the stay the Court denied as moot, all pending motions, including the Motion
 14 for Remand. The Court further ordered that the Parties file any motions that were
 15 denied as moot within 30 days of the issuance of the mandate in the *Wells Fargo II*
 16 *Appeal* [ECF No. 19];
- 17 5. On December 28, 2021, U.S. Bank filed a Renewed Motion for Remand;
- 18 6. Chicago Title’s deadline to respond to U.S. Bank’s Renewed Motion for Remand is
 19 currently January 11, 2022;
- 20 7. Chicago Title’s counsel is requesting an extension until January 25, 2022, to file its
 21 response to the pending Renewed Motion for Remand;
- 22 8. Chicago Title requests a brief extension of time to respond to the Motion for Remand
 23 to afford Chicago Title additional time to respond to the legal arguments set forth in
 24 U.S. Bank’s motions;
- 25 9. U.S. Bank does not oppose the requested extension;
- 26 10. This is the first request for an extension which is made in good faith and not for
 27 purposes of delay;

28 ///

1 **IT IS SO STIPULATED** that Chicago Title's deadline to respond to U.S. Bank's Motion
2 for Remand [ECF No. 22] is hereby extended through and including January 25, 2022.

3
4 Dated: January 10, 2022

EARLY SULLIVAN WRIGHT
GIZER & McRAE LLP

5
6 By: /s/-- Sophia S. Lau
SCOTT E. GIZER
SOPHIA S. LAU
7 Attorneys for Defendant CHICAGO TITLE
8 INSURANCE COMPANY

9 Dated: January 10, 2022

SINCLAIR BRAUN LLP

10 By: /s/-Kevin S. Sinclair
11 KEVIN S. SINCLAIR
Attorneys for Defendant CHICAGO TITLE
12 INSURANCE COMPANY

13 Dated: January 10, 2022

WRIGHT FINLAY & ZAK, LLP

14 By: /s/-Lindsay D. Dragon
15 LINDSAY D. DRAGON
Attorneys for Plaintiff U.S. BANK
16 NATIONAL ASSOCIATION

17 **IT IS SO ORDERED:**

18
19 Dated: January 11, 2022

20 By: 
UNITED STATES DISTRICT COURT JUDGE

CERTIFICATE OF SERVICE

I hereby certify that on January 10, 2022, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the Electronic Service List for this Case.

I declare under penalty of perjury under the laws of the United State of America that the foregoing is true and correct.

/s/ D'Metria Bolden

D'METRIA BOLDEN

An Employee of EARLY SULLIVAN

WRIGHT GIZER & McRAE LLP

